

Responses to Comments Received from the Permittee for the Preliminary Waste Discharge Requirements for the Sonoma West Holdings' Wastewater Treatment Facility

1. Response to Comment One: Removal of the Fifth Septic Tank.

Comment noted and the correction was made. See Finding No. 8.

2. Response to Comment Two: Correction to Process Wastewater System.

Comment noted and the correction was made. See Finding No. 8.

3. Response to Comment Three: Non-Contact Cooling Water.

Comment noted. References to non-contact cooling water have been removed from the Permit.

4. Response to Comment Four: Domestic and Process Wastewater Disposed of on Bench No. 1.

Comment noted. The Permit has been corrected to reflect the disposal of domestic waste to the bermed area of Bench No. 1 and the disposal of process wastewater to the rest of Bench No. 1. See Finding No. 9.

5. Response to Comment Five: Overland Flow Treatment.

Comment noted and the Permit was corrected. The prohibition has been removed from the Permit.

6. Response to Comment Six: Storm water Discharge from the Benches.

Comment noted and the Permit was corrected. See Finding No. 8 for the conditions under which storm water may be discharged from the benches.

7. Response to Comment Seven: Prohibition of Storm water Discharge from the Benches.

Clarification on the stormwater discharge has been addressed in the revised Permit. Adequate information was not included in this comment to verify that the conflict has been resolved.

8. Response to Comment Eight: New Tenant Requirements.

The requirement for two effluent samples collected from new tenants has been removed from the Permit. See Finding No. 9.

9. Response to Comment Nine: New Tenant Criteria.

To allow for the addition of a cheese processor, monitoring for total coliform organisms has been added to the Monitoring and Reporting Program for discharges to surface water and wastewater in storage. It is the understanding of the Regional Water Board staff (staff) that the whey and solids from the cheese production will be hauled off-site.

10. Response to Comment Ten: BMP Manual.

While staff does not have any written guidelines on development of a BMP Manual, staff is available to discuss the creation of the manual and answer questions.

11. Response to Comment Eleven: Outfalls.

Comment noted and the Permit has been corrected. See Finding No. 9.

12. Response to Comment Twelve: Solid Waste Handling.

Solid waste must be handled properly and disposed of at a legal point of disposal. See Provision F. Solids Disposal and Handling Requirements for further details.

13. Response to Comment Thirteen: California Toxics Rule Requirements.

The discussion of the California Toxics Rule requirements in the Permit has been updated to reflect the work that the Permittee has completed.

14. Response to Comment Fourteen: Permit Omission of the Word “treated”.

Comment noted and the Permit has been corrected.

15. Response to Comment Fifteen: Clarification of Discharge Prohibition A.4.

This discharge prohibition has been modified to reflect authorized discharges of wastewater.

16. Response to Comment Sixteen: Prohibition of Waste Discharge within Treatment System.

This prohibition concerns spills, upsets and bypasses; not the treatment process.

17. Response to Comment Seventeen: Prohibition of Waste Discharge within Treatment System.

This prohibition concerns spills, upsets and bypasses; not the treatment process.

18. Response to Comment Eighteen: Influent Flow Rate.

Prohibition A.14 limits the influent flow rate.

19. Response to Comment Nineteen: Acute Toxicity Testing.

Acute toxicity testing is only applicable to the surface water discharge.

20. Response to Comment Twenty: BOD Monitoring.

The requirement for BOD monitoring prior to discharge to the treatment benches has been removed from the Permit.

21. Response to Comment Twenty-One: Total Coliform Sampling Location.

Samples shall be collected after the wastewater passes through the chlorine contact chamber.

22. Response to Comment Twenty-Two: Solid Waste Disposal.

The tenants of the Permittee can arrange individually to have their solid waste disposed of at a legal point of disposal. The Permittee, however, is responsible for knowledge of the disposal location and any enforcement actions related to this Permit.

23. Response to Comment Twenty-Three: New Tenant Requirements.

See Response to Comment Eight.

24. Response to Comment Twenty-Four: Water Recycling Requirements.

The Permittee has agreed to comply with the water recycling requirements included in the Permit.

25. Response to Comment Twenty-Five: Laboratory Testing.

The Permittee may perform the pH, turbidity and temperature testing. The Permittee shall have the proper equipment and retain the maintenance and calibration records for staff to view upon request.

26. Response to Comment Twenty-Six: Acute Toxicity Testing.

See Response to Comment 19.

27. Response to Comment Twenty-Seven: Toxicity Reduction Evaluation.

There is EPA guidance available for these documents. Staff is available to answer questions.

28. Response to Comment Twenty-Eight: Monitoring Frequency.

The monitoring frequency has been reduced as requested. Please see the Monitoring and Reporting Program.

29. Response to Comment Twenty-Nine: Monitoring the Discharge to the Benches.

The monitoring required for discharge to the benches has been removed from the Permit.

30. Response to Comment Thirty: Monitoring Redundancy.

As the monitoring requirements for discharge to the treatment benches has been removed, monitoring the wastewater in storage is not redundant.

31. Response to Comment Thirty-One: Monitoring Receiving Water.

The receiving water monitoring locations have been reduced as requested. Please see the Monitoring and Reporting Program.

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